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**PETERS | SCOFIELD**

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**UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH**

<p>KRISTIN PILKINGTON, individually and on behalf of all others similarly situated,  Plaintiff,  v.  GORSUCH, LTD.,  Defendant.</p>	<p><b>MOTION FOR ADMISSION PRO HAC VICE OF FRANK S. HEDIN</b>  Case No. 2:24-cv-00434-RJS/DBP  Chief District Judge Robert J. Shelby Magistrate Judge Dustin B. Pead</p>
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I move for the pro hac vice admission of Frank S. Hedin (Applicant) as counsel for KRISTIN PILKINTON individually and on behalf of all others similarly situated, and I consent to serve as local counsel. I am an active member of this court's bar.

The application and proposed order are attached as exhibits, and the admission fee will be paid to the court at the time of filing. I certify that I have verified with the Applicant that the information contained in the application is true and accurate.

As stated in the application, Mr. Hedin has been admitted on a pro hac vice basis in this District in three matters within the past five years. Each of these matters concerns consumer privacy claims brought under the Utah Notice of Intent to Sell Nonpublic Personal Information

Act, Utah Code Ann. § 13-37 (the “NISNPIA”). Likewise, the above-captioned action also concerns consumer privacy claims brought under the NISNPIA.

Mr. Hedin’s law firm specializes in class actions, including consumer class actions and data privacy class actions. *See* Declaration of Frank S. Hedin, ¶ 5 (filed concurrently herewith). To the best of my knowledge, Mr. Hedin’s law firm is the only firm in the country bringing claims under the NISNPIA. *See, e.g.*, Declaration of Frank S. Hedin, ¶ 8. If Mr. Hedin were not allowed to be admitted pro hac vice in this NISNPIA class action, the plaintiff may not be able to find other, fully knowledgeable representation in this case. Mr. Hedin is uniquely familiar with the legal and factual issues being adjudicated under the NISNPIA, both procedurally and substantively.

However, Mr. Hedin does not intend to practice law generally in Utah, nor does he maintain offices in the state. *See, e.g.*, Declaration of Frank S. Hedin, ¶ 9. For these reasons, I respectfully submit that there is good cause within the meaning of Local Civil Rule 83-1.1(c)(1) for Mr. Hedin’s admission on a pro hac vice basis in this matter. A proposed form of Order is attached hereto.

Dated: April 8, 2025

Respectfully submitted,

**PETERS | SCOFIELD**  
*A Professional Corporation*

/s/ David W. Scofield  
DAVID W. SCOFIELD  
*Attorney for Plaintiff and Putative Class*